



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

JUL 24 2018

907010: RKD
3311/308416

Mr. Roland Damasco
Trinity Force Corporation
19224 E. Walnut Drive, Unit D
Industry, California 91748

Dear Mr. Damasco,

This refers to your correspondence and sample to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), requesting clarification pertaining to a device referenced as a "*TRINITY FORCE AR PISTOL STABLIZER/BRACE*". You state that the AR Pistol Stabilizer "*is not made to be shouldered when firing and is solely designed to aid individuals when firing with the support of the forearm*".

For your reference in this matter, the amended Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3), defines the term "firearm" to include *any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and] ...the frame or receiver of any such weapon....*

Also, with respect to the definitions of "handgun" and "pistol" under Federal statutes and regulations, you may be aware that the GCA, 18 U.S.C. § 921(a)(29), defines "handgun" to mean, in part: *...a firearm which has a short stock and is designed to be held and fired by the use of a single hand....*

Additionally, 27 CFR § 478.11, a regulation implementing the GCA, defines "pistol" as:
...a weapon originally designed, made, and intended to fire a projectile (bullet) from one or more barrels when held in one hand, and having (a) a chamber(s) as an integral

part(s) of, or permanently aligned with, the bore(s); and (b) a short stock designed to be gripped by one hand and at an angle to and extending below the line of the bore(s).

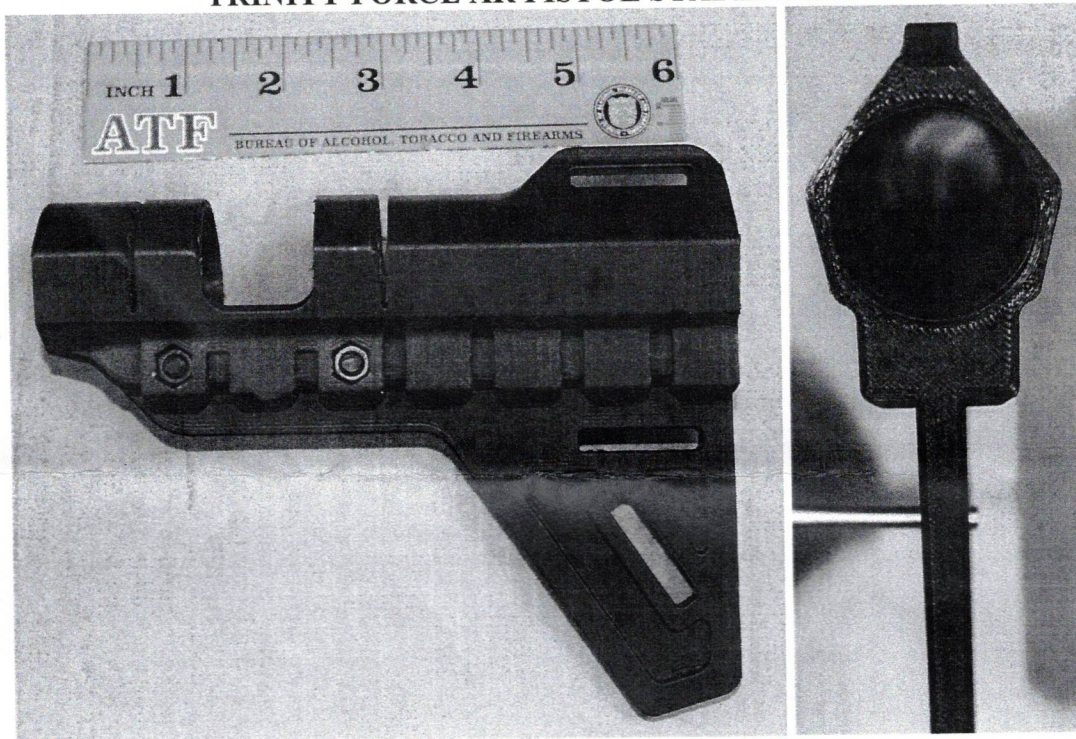
Please note also that the GCA, 18 U.S.C. § 921(a)(7), defines the term “rifle” to include a *weapon designed or redesigned, made or remade, and intended to be fired from the shoulder....*

Finally, the NFA, 26 U.S.C. § 5845(a)(3), defines “firearm” to include a *rifle having a barrel or barrels of less than 16 inches in length....*

While the attachment of certain stabilizing brace devices to some handguns has been approved by ATF in the past, arm stabilizing brace devices were originally submitted to FTISB for classification as a product that was designed and intended to assist handicapped shooters to maintain control of a specific type of handgun.

Your submitted device is designed to slip over round AR-15 pistol type receiver extension/buffer tubes. It utilizes a clamping arrangement on the forward portion of the device.

TRINITY FORCE AR PISTOL STABLIZER/BRACE



FTISB research has determined the average length of pull found on shoulder-fired weapons is approximately 13.5-14.5 inches. As previously stated, a stabilizing brace is not designed to be shouldered and therefore should not have a length consistent with shoulder stocks if it is not intended to change the firearm classification to a rifle or shotgun.

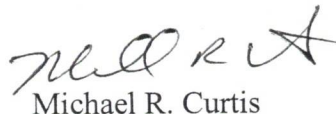
ATF confirms that if used as designed to assist shooters in stabilizing a handgun while shooting with a single hand, and the stabilizing brace is installed on an AR-15 type pistol so that the distance from the face of the trigger to the rear of the device is less than 13 ½ inches-the device is not considered a shoulder stock and therefore may be attached to a handgun without making a NFA firearm.

We caution that these findings are based on the sample as submitted. If the design, dimensions, configuration, method of operation, or materials used were to be changed, our determination would be subject to review. Your sample firearm will be returned via your provided USPS Priority Mail return shipping label.

Finally, because State laws and local statutes can exceed Federal firearms laws in scope, we advise you to confirm that the installation of a "*TRINITY FORCE AR PISTOL STABLIZER/BRACE*" onto an AR-15 type pistol does not violate any State laws or local ordinances where the device will be marketed or possessed in conjunction with AR-15 type pistols. ATF generally does not offer opinions pertaining to comparisons between Federal law or rulings and State law or local ordinances.

We thank you for your inquiry, and trust the foregoing has been responsive to your request.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael R. Curtis", with a stylized flourish at the end.

Michael R. Curtis

Chief, Firearms Technology Industry Services Branch